IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

) Re: Docket Nos. 5 and 276
Debtors.) (Jointly Administered)
YELLOW CORPORATION, et al.,1) Case No. 23-11069 (CTG)
In re:) Chapter 11

CERTIFICATION OF COUNSEL REGARDING FINAL ORDER (I) AUTHORIZING THE PAYMENT OF CERTAIN PREPETITION AND POSTPETITION TAXES AND FEES AND (II) GRANTING RELATED RELIEF

The undersigned hereby certifies the following:

- 1. On August 7, 2023, the debtors and debtors in possession (collectively, the "Debtors"), in the above-captioned cases, filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief* (the "Motion") [Docket No. 5].
- 2. On August 17, 2023, the Court entered the *Interim Order (I) Authorizing* the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief (the "Interim Order") [Docket No. 276].
- 3. The deadline to object to the Motion was August 31, 2023 at 4:00 p.m. Eastern Time.
- 4. The Debtors circulated a proposal form of final order to the Office of the United States Trustee, counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, and the United States Department of the Treasury (the

A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at https://dm.epiq11.com/YellowCorporation. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

"Reviewing Parties"). No formal or informal comments or objections were received from third parties.

- 5. Attached hereto as <u>Exhibit A</u> is a revised proposed form of final order (the "<u>Revised Proposed Final Order</u>") that has been circulated to the Reviewing Parties, which do not object to entry of the order. Attached hereto as <u>Exhibit B</u> is a redline of the Revised Proposed Final Order showing changes against the final order filed with the Motion.
- 6. Accordingly, the Debtors respectfully request entry of the Revised Proposed Final Order at the Court's earliest convenience.

Dated: September 12, 2023 Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436) Timothy P. Cairns (DE Bar No. 4228) Peter J. Keane (DE Bar No. 5503) Edward Corma (DE Bar No. 6718)

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